

## REMARKS/ARGUMENTS

Claims 1-23 are pending. Claims 1, 15, 16, and 22 are the only independent claims. Claims 15, 22, and 24 have been allowed, and claims 2-5, 10, 11, 13, 14, and 21 have been deemed allowable. Item Numbers C01, C02, and C04-C12, which are listed in the form PTO-1440 of the Information Disclosure Statement that was submitted on January 9, 2004 (“First IDS”), failed to include a publication date. Claims 1, 6-9, 12, and 16-20 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Mosler Operating Manual: CF-420 Cash Management System, 72 pages, 1989 (Item C13 of PTO-1449 filed January 9, 2004) (“Mosler”).

### **Allowable Subject Matter**

Claims 15, 22, and 23 have been allowed. Claims 2-5, 10, 11, 13, 14, and 21 have been objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. The Applicants agree that claims 2-5, 10, 11, 13, 14, and 21 are directed to independently allowable subject matter.

### **Information Disclosure Statement**

Item Numbers C01, C02, and C04-C12 have been placed in the file but have not been considered. A Revised Form PTO-1449 has been filed concurrently with this response to comply with the Examiner’s request. Specifically, Item Numbers C01, C02, and C04-C12 have been modified to show an estimated publication date.

### **Rejections under § 103**

Claims 1, 6-9, 12, and 16-20 have been rejected as being unpatentable over Mosler. Specifically, the Examiner has alleged that the “cash management system disclosed by the Mosler manual incorporates a hopper that reads on the Applicant’s cash receptacle (claims 1 and 16-19) as well as the ability of totaling both currency notes and coins (page B-4) that reads on the Applicant’s bill total and coin total determination.” This rejection is respectfully traversed. Contrary to the Examiner’s allegation, Mosler does not teach a “hopper that reads on the Applicant’s cash receptacle” or a system that makes a “coin total determination.”

Claim 1 is directed to a method including “providing a cash receptacle containing a plurality of currency bills and a plurality of coins,” “providing a target amount of cash to be

stored in said cash receptacle,” “determining a coin total . . . by using said coin processing device,” and “storing remaining currency bills and coins in said cash receptacle.” Claim 16 is directed to a system including “a coin device for counting coins in the cash receptacle and determining a coin total.” Claims 1 and 16 are the only independent claims that have been rejected.

Referring to claim 1, Mosler fails to teach or suggest a cash receptacle that contains currency bills “and coins,” a system for “determining a coin total,” or a system for “storing remaining currency bills and coins in said cash receptacle.” Referring to claim 16, Mosler fails to teach or suggest a system including “a coin device for counting coins in the cash receptacle and determining a coin total.” The system taught by Mosler cannot receive or count coins. At most, the Mosler system allows a user to manually enter coin amounts, which have been counted independently of the Mosler system, into a currency bill total. A cursory review of Mosler supports the fact that the Mosler system is capable of receiving only currency bills:

- You can load the CF-420 with up to 400 notes (page 1-3)
- Load up to 400 notes, press start, and an instant later they'll be sorted and counted – and the deposit amount will be recorded. (page 3-3)
- The Hopper holds and feeds the notes into the CF-420. Located at the top, center of the machine, the Hopper is actually the beginning of the CF-420's transport system. For this reason, you must be certain to place the notes properly in the Hopper. (page 3-14)
- Load the Hoper with the deposit notes. (page 4-8)
  - do not put more than 400 notes in the Hopper at one time (page 4-9)
  - make sure that the notes are evenly stacked, with all edges parallel (page 4-9)
  - squarely place the notes against the Hopper backstop (page 4-9)
  - lower the Hopper lid before pressing START (page 4-9)

There is no mention whatsoever about the hopper of the Mosler system being capable of receiving or storing coins. Further, the Mosler system is incapable of counting coins or determining a coin total:

- If your deposit includes checks, coin, or other media, you'll enter the amount and press the appropriate Denomination key. Let's say that the deposit included a check for \$25.79. Simply enter 25.79 then press CHECK. (page 3-22)

- The recorded data includes machine counted notes, manually entered coin, check , and food stamps. (page 3-18)
- You can also process non-currency media like checks, coins, and food stamps by entering them on the keyboard. (page 3-3)
- If your deposit includes checks, coins, or other media, you'll need to enter the amount and press the appropriate Denomination key. (page 4-10)

At most, a user of the Mosler system is permitted to add known coin values to a currency bill total. However, the Mosler system simply does not count coins.

Thus, the Applicants respectfully submit that claims 1, 6-9, 12, and 16-20 are not obvious based on Mosler at least for the above-stated applicable reasons.

### Conclusion

The Applicant respectfully submits that all the pending claims are now in condition for allowance. Reconsideration of this application in light of the foregoing remarks is respectfully requested. If there are any matters which may be resolved or clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney at the number indicated.

It is believed that no fee is presently due; however, should any additional fees be required (except for payment of the issue fee), the Commissioner is authorized to deduct the fees from Jenkens & Gilchrist, P.C. Deposit Account No. 10-0447, Order No. 47171-00410USPT.

Respectfully submitted,

By 

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